

AO 21 (REV. 5/85) Criminal Complaint

SAUSA Michelle Petersen (312) 353-5305

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

FILEDMAGISTRATE JUDGE COX
CRIMINAL COMPLAINT

v.

5-16-12
MAY 16 2012

CASE NUMBER:

EDWARD D. BOATMAN

THOMAS G BRUTON UNDER SEAL
CLERK, U S DISTRICT COURT

120R

367

I, the undersigned complainant, being duly sworn on oath, state that the following is true and correct to the best of my knowledge and belief: On or about January 15, 2012, at Stickney, Illinois, in the Northern District of Illinois, Eastern Division, EDWARD D. BOATMAN defendant herein:

did by intimidation, take from the person and presence of bank employees, approximately \$334.50 in United States Currency belonging to and in the care, custody, control, management, and possession of the TCF Bank branch office located at 7122 West 40th Street, Stickney, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

in violation of Title 18, United States Code, Section 2113(a). I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the facts contained in the Affidavit which is attached hereto and incorporated herein.



Signature of Complainant
JAMES J. FERGUSON
Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

May 16, 2012

Date

at

Chicago, Illinois

City and State

SUSAN E. COX, U.S. Magistrate Judge
Name & Title of Judicial Officer



Signature of Judicial Officer

cause to believe that the defendant violated Title 18, United States Code, Section 2113(a).

3. This affidavit is based on my personal knowledge based upon my participation in this investigation, reports I have read relating to this investigation, conversations I have had with other law enforcement agents who have knowledge of the events and circumstances described herein, and interviews of bank employees and witnesses.

FACTS SUPPORTING PROBABLE CAUSE

Robbery of TCF Bank, Stickney, Illinois, on January 15, 2012

4. On January 15, 2012, at approximately 10:10 a.m., a black male approached the counter of TCF Bank, 7122 West 40th Street, Stickney, Illinois. According to a TCF Bank teller ("Teller A") the black male was approximately 5'11" to 6'0" in height, average weight, was between 24 and 25 years of age, wore a black ball cap, black hooded sweatshirt and had a beard. The robber handed Teller A a white piece of paper with green lettering and said "here" or something to that effect. According to Teller A, the note said, "Give me 50's and 20's, I have a gun." According to Teller A, she did not see a gun on the robber's person. Teller A took money from a TCF Bank drawer and put it into a brown paper bag that the robber was holding. While looking into Teller A's drawer, the robber asked Teller A if he/she gave him everything. Teller A replied, "yes." Then, the robber asked about the coinage saying he wanted that also. Teller A placed coins into the brown paper bag. The robber took the money and walked out of the bank leaving the demand note behind.

5. An audit of the teller drawer at TCF Bank showed that as a result of the

bank robbery, TCF Bank incurred a loss of approximately \$334.50. The FBI has obtained a copy of TCF Bank's FDIC Certificate, which confirms that, at the time of the robbery, the deposits of TCF Bank were insured by the FDIC.

6. At the time of the bank robbery TCF Bank had a working video surveillance system that captured images of the bank robber. I have personally viewed images of the robbery. The images show the bank robber was a black male with an average build. The robber had on a black ball cap, black hooded sweatshirt, and faded blue jeans. Using his hands, the robber unfolded the demand note which he placed on the counter. The robber was not wearing gloves.

7. The TCF Bank was located within a Jewel grocery store. The Jewel store had parking lot surveillance cameras which captured images of the bank robber around the time of the robbery on January 15, 2012. I have personally viewed the Jewel surveillance video. Before the robbery, the robber exited the driver's side of an older model, four-door car, red or burgundy in color. After the robbery, a surveillance camera captured the robber running to the car and entering it on the driver's side before the car drove off.

Identification of EDWARD D. BOATMAN as the Bank Robber

8. On January 15, 2012, an FBI Agent responded to the bank robbery and recovered the demand note. The demand note was sent to the FBI Laboratory for fingerprint examination. According to a report completed by an examiner at the FBI Laboratory, 13 latent fingerprints of value were detected on the demand note. An examination of the 13

fingerprints on the demand note identified 12 of the fingerprints as being from EDWARD D. BOATMAN, based on a comparison of the latent prints to known prints of EDWARD D. BOATMAN in a law enforcement database.

9. Based upon aforementioned information, I obtained the most current Illinois Secretary of State ("SOS") identification card photograph of BOATMAN taken on March 5, 2008. According to the SOS, BOATMAN's height was listed as 6'2" and his weight was listed as 225 lbs. BOATMAN's height and weights were close to the robber's physical description provided by Teller A (5'11" to 6'0" tall with an average build). According to SOS records, BOATMAN was black male, 37 years of age with a revoked driver's license.

10. I checked SOS records which list BOATMAN as a co-owner on a red, 1989 Buick Coupe, Vehicle Identification Number (VIN) 1G4AH11R3KG406375, and bearing registration 224 3990. The registration was expired/suspended for a mandatory insurance violation. I checked the VIN through GM VIN Decoder, an on-line service, which confirmed the aforementioned VIN belongs to a 1989 Buick Century Custom. Utilizing Wikipedia, an on-line encyclopedia, I found a photograph of a 1989 Buick Century, the image of which matched the robber's vehicle.


11. On March 28, 2012, a six person photographic line-up consisting of six black males, with a known photograph of EDWARD D. BOATMAN in position # 4 was assembled by the FBI. I showed the photo array to Teller A with the understanding that the bank robber may or may not be in the photo spread. Additionally, Teller A was advised that

he/she was not required to make an identification. After viewing the photo spread, Teller A pointed to the photograph in position #4 (BOATMAN) and stated #4 "looks a lot like him," meaning the robber. Teller A was not able to say positively #4 (BOATMAN) was the robber; however, Teller A stated #4 (BOATMAN) had the same cheeks/jaws as the robber.


Conclusion

12. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that EDWARD D. BOATMAN did, by intimidation, take approximately \$334.50 in United States Currency belonging to and in the care, custody, control, management, and possession of the TCF Bank branch office located at 7122 West 40th Street, Stickney, Illinois, the deposits of which were then insured by the FDIC, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.


SA JAMES J. FERGUSON
Special Agent, Federal Bureau of Investigation

SUBSCRIBED AND SWORN to before me on May 15th, 2012.


Susan E. Cox
United States Magistrate Judge